

REMARKS

Claims 188-191 and 314 are all the claims currently pending in this Application.

As a preliminary issue, Applicants request that the Examiner consider the references cited in the IDSs of September 30, 2005 and July 13, 2007 and return signed and initialed copies of the PTO forms with the next Office communication.

Claims 188-191 and 314 are rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Jain (U.S. Patent 6,515,257) in view of James (U.S. Patent 5,463,200) and Sasaki (U.S. Patent 6,977,775). Claims 190 and 191 are rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Jain in view of James, Sasaki, JP '505 (JP 406043505), and JP '142 (JP 2003051142). Claims 188-191 and 314 are rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Jain in view of James, Loschner (U.S. Patent 6,989,546), and Abboud (U.S. Patent 6,433,348). Claims 190 and 191 are rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Jain in view of James, Loschner, Abboud, JP '505, and JP '142. Applicants respectfully traverse these rejections.

Applicants respectfully submit that none of the cited references, either alone or in combination, teach or suggest “independently optically focusing ones of said plurality of laser beams to different independently selectable locations, said independently focusing comprising moving at least one optical element, for focusing an optical beam, associated with one of the plurality of laser beams to be focused, without f-theta optical elements”, as recited in claim 188.

Jain. Regarding this limitation, the Examiner asserts that “the via generation system comprises a focusing lens 44,” (Figs. 1, 6, and 7). Applicants note that this lens has nothing to do with focusing a beam to a work piece. Rather, this lens is merely used to introduce the laser beam to the homogenizer 30 and is unrelated to focusing the laser beam as a whole and nothing to do with independently focusing one or more or a plurality of laser beams. The movement of this lens 44 would have no effect at all on any focusing properties of the system. Rather, a movement of this lens would only effect the overall intensity, as less of the laser energy would manage to enter the homogenizer. Therefore, no illustration or discussion relating to this lens in Jain teaches or suggests “independently optically focusing ones of said plurality of laser beams...”, as recited.

Additionally, the Examiner asserts that “the laser provides input to microlens array 10 and micromirror array 12 directs the beamlets independently.” With respect to the microlens array, Applicants submit that none of the lenses of the microlens array provide any independent focusing, and none of the lenses of the microlens array are moveable. With respect to the micromirror array, Applicants submit likewise, that none of the micromirrors provide any focusing, and none of the micromirrors provide a directing or beams to independently selectable locations. Rather, the micromirrors are each in either an on state or an off state to either direct a beam incident thereon to a substrate or to discard a beam incident thereon. Therefore, even in

combination, the microlens array and the micromirrors fail to teach or suggest the above-discussed limitation.

Additionally, no other portion of Jain teaches or suggests the above-discussed limitation.

James. Even to the extent that James discusses focusing with respect to the microlens array, like Jain, James fails to teach or suggest any independent focusing, as recited in claim 188.

Additionally, no other portion in James teaches or suggests the above-discussed limitation.

Sasaki. Sasaki is generally directed to controlling the shape of a beam in order to achieve an elliptical beam spot. Sasaki fails to teach or suggest independently focusing a plurality of beams, as recited in claim 188.

Additionally, Applicants submit that Sasaki is directed to a non-dynamic apparatus (no scanning), and is in a completely different field of invention (a method and apparatus for crystallizing a semiconductor). Therefore, in addition to failing to teach or suggest the above-discussed limitation, one of skill in the art would not be motivated to look to Sasaki for combination with Jain or James.

Loschner, Abboud, JP '505, and JP '142. Applicants submit that none of these references remedy the above-discussed deficiencies of Jain, James, and Sasaki.

Therefore, Applicants submit that claim 188 is patentable over any of the cited combinations of references and that claims 189-191 and 314 are patentable at least by virtue of

RESPONSE UNDER 37 C.F.R. § 1.111
U.S. Application 10/660,730

Q77482

their dependence on claim 188. Applicants respectfully request that the rejections of the claims be reconsidered and withdrawn.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Suzanne C. Waits
Reg. No. 60,831 for:

Laura Moskowitz
Registration No. 55,470

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: September 17, 2007